

THE HON. JAMES L. ROBERT

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

EXPANDING ENTERPRISES, LLC, a  
Washington limited liability company,

Plaintiff,

vs.

CONTINENTAL WESTERN INSURANCE  
COMPANY, an Iowa corporation,

Defendant.

No. 2:17-cv-00484 JLR

AND ORDER

STIPULATED MOTION REGARDING  
TIME TO ANSWER AND PROPOSED  
ORDER.

Note on Motion Calendar March 30, 2017

**STIPULATION**

The parties, by and through their respective attorneys of record, hereby stipulate as follows:

The deadline for Continental Western Insurance Company's Answer has not yet expired. See Fed. R. Civ. P. 81(c)(2) (current deadline based upon removal date). Good cause exists to extend this deadline, because Continental Western Insurance Company requires additional time to provide full Answer to the claims in this matter, and the additional time will allow full answer, will preclude amendment of the Answer, including motions

STIPULATED MOTION AND PROPOSED  
ORDER (Cause No. 2:17-cv-00484 JLR) – 1  
mmp/LCN6412.234/2512843x



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1 regarding same, and will not delay trial or otherwise prejudice the parties or inconvenience  
2 the Court. *See* Fed. R. Civ. P. 6(b)(1). The parties request that the Court order that the  
3 deadline for Continental Western Insurance Company's Answer is extended three weeks,  
4 from March 31, 2017, to April 21, 2017.

5  
6 IT IS SO STIPULATED. The parties move the Court for an Order regarding this  
7 deadline.

8 Dated this 30th day of March, 2017.

9  
10 WILSON SMITH COCHRAN DICKERSON

11 By s/ John M. Silk Lisa C. Neal

12 John M. Silk, WSBA No. 15035

13 Lisa C. Neal, WSBA No. 25686

14 Attorneys for Defendant

15 MONTGOMERY PURDUE BLANKINSHIP

16  
17 By s/ Andrew R. Chisolm

18 Andrew R. Chisolm, WSBA No. 30673

19 Attorney for Plaintiff  
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**ORDER**

Based upon the above stipulation, and for good cause shown, it is hereby ORDERED that Continental Western Insurance Company's Answer in this matter is due on April 21, 2017. Any deadlines dependent upon the deadline for Answer are also hereby extended to the relevant time period following the filing of the Answer.

Dated this 30<sup>th</sup> day of March, 2017.

  
\_\_\_\_\_  
THE HONORABLE JAMES L. ROBART

Presented by:

WILSON SMITH COCHRAN DICKERSON

By s/ John M. Silk Lisa C. Neal  
John M. Silk, WSBA No. 15035  
Lisa C. Neal, WSBA No. 25686  
Attorney for Defendant

MONTGOMERY PURDUE BLANKINSHIP

By s/ Andrew R. Chisolm  
Andrew R. Chisolm, WSBA No. 30673  
Attorney for Plaintiff



**CERTIFICATE OF SERVICE**

The undersigned certifies that under penalty of perjury under the laws of the State of Washington that on the below date I caused to be served via ECF the foregoing document on:

**Attorney for Plaintiff**

Andrew R. Chisolm  
Montgomery Purdue Blankinship & Austin  
5500 Columbia Center  
701 Fifth Avenue  
Seattle, WA 98104-7096  
( ) Via U.S. Mail  
( ) Via Facsimile: (206) 625-9534  
( ) Via Hand Delivery  
(X) Via Email: achisholm@mpba.com

**SIGNED** this 30<sup>th</sup> day of March, 2017, at Seattle, Washington.

s/ Alicia Ossenkop  
Alicia Ossenkop